

Exhibit 10

Jennifer Burdis
December 09, 2020

14 to 17

<p style="text-align: right;">Page 14</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 privacy training, to recruitment trainings on our</p> <p>2 systems and processes, to candidate management</p> <p>3 training and company trainings that would include,</p> <p>4 you know, all-encompassing recruitment processes</p> <p>5 including level, what to look for in candidates'</p> <p>6 background, skill sets, things like that.</p> <p>7 Q. Did you receive any training related</p> <p>8 to compensation or setting compensation?</p> <p>9 A. Yes.</p> <p>10 Q. Did you receive any training related</p> <p>11 to anti-bias?</p> <p>12 A. Yes.</p> <p>13 Q. And did you receive any training</p> <p>14 related to discrimination?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Did you receive trainings</p> <p>17 related to particular systems used at Google?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Did you receive trainings in</p> <p>20 GHire?</p> <p>21 A. Yes.</p> <p>22 Q. And how about Thrive?</p> <p>23 A. No, I did not have training in</p> <p>24 Thrive.</p> <p>25</p>	<p style="text-align: right;">Page 16</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 MS. GELFAND: Okay.</p> <p>2 Q. So what was your role as the</p> <p>3 recruiter for the technical director role in OCTO?</p> <p>4 A. I was the lead recruiter on the</p> <p>5 hiring project.</p> <p>6 Q. And when did you become aware that</p> <p>7 OCTO was looking to hire for the technical</p> <p>8 director role?</p> <p>9 A. In 2016. I can't recall the month.</p> <p>10 Q. And was Will Grannis the hiring</p> <p>11 manager for that role?</p> <p>12 A. Yes.</p> <p>13 Q. And did you -- did you meet with Mr.</p> <p>14 Grannis to discuss recruitment for the technical</p> <p>15 director position?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Can you tell me everything you</p> <p>18 recall discussing with Mr. Grannis the scope of</p> <p>19 the technical director position?</p> <p>20 A. So I can't recall the conversation</p> <p>21 verbatim, but I do recall meeting with Will and</p> <p>22 discussing him structuring a job description which</p> <p>23 would be for hiring a reasonably large volume of</p> <p>24 technical director level candidates into Google on</p> <p>25</p>
<p style="text-align: right;">Page 15</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 Q. So at what point did you begin</p> <p>2 supporting the Office of the CTO or OCTO?</p> <p>3 A. I believe it was at some point during</p> <p>4 the beginning of 2016.</p> <p>5 Q. Okay. So let's focus on when you</p> <p>6 were supporting OCTO and specifically about the</p> <p>7 technical director office of the CTO position, and</p> <p>8 I'm going to call it technical directors going</p> <p>9 forward. Is that okay?</p> <p>10 A. Yes.</p> <p>11 Just -- you're slightly muffled in</p> <p>12 the audio. I think it's because we're trying to</p> <p>13 -- I can hear you, but I'm just having to listen</p> <p>14 carefully so that might --</p> <p>15 MR. GAGE: I think it may be at your</p> <p>16 end, Shira, too, because I hear you, but</p> <p>17 you're a little distant.</p> <p>18 MS. GELFAND: Okay, that's fine. Let</p> <p>19 me know if this is better. Is this better?</p> <p>20 MR. GAGE: It's better. As you lean</p> <p>21 a little forward like you're right now, I can</p> <p>22 hear you clearly.</p> <p>23 MS. GELFAND: Okay, I will project.</p> <p>24 MR. GAGE: Now that works.</p> <p>25</p>	<p style="text-align: right;">Page 17</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 the individual contributor ladder at L 8 and L 9.</p> <p>2 Q. Okay, and can you tell me everything</p> <p>3 that you recall Mr. Grannis saying about the</p> <p>4 leveling of the role?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. I don't recall specifics.</p> <p>7 Q. Okay, and did you work with Mr.</p> <p>8 Grannis to come up with the external job posting</p> <p>9 for the technical director role?</p> <p>10 A. I did.</p> <p>11 Q. Okay, and what was your role in</p> <p>12 drafting that job posting?</p> <p>13 A. To make sure it was compliant,</p> <p>14 inclusive, and formatted correctly for sharing</p> <p>15 online and -- and sharing externally with</p> <p>16 non-Googleers.</p> <p>17 Q. What do you mean by "compliant" and</p> <p>18 "inclusive"?</p> <p>19 A. To make sure our minimum</p> <p>20 qualifications and preferred qualifications were</p> <p>21 in line with our company policy.</p> <p>22 Q. Okay. Okay. Is there anything else</p> <p>23 that you recall discussing with Mr. Grannis in</p> <p>24 terms of what the role would entail?</p> <p>25</p>

Jennifer Burdis
December 09, 2020

26 to 29

<p style="text-align: right;">Page 26</p> <p>1 - JENNIFER BURDIS -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. I do not know.</p> <p>4 Q. And so were there minimum</p> <p>5 qualifications that candidates had to meet for</p> <p>6 this technical director role?</p> <p>7 A. Yes.</p> <p>8 Q. And what were those minimum</p> <p>9 qualifications?</p> <p>10 A. They're listed on the job</p> <p>11 description. I would have to refresh by reading</p> <p>12 it, but the minimum qualifications are documented</p> <p>13 on the job description.</p> <p>14 Q. Okay, and where are they documented</p> <p>15 on the job description?</p> <p>16 A. On the second page of Exhibit 61, I</p> <p>17 believe.</p> <p>18 Q. So would that be under "Skills and</p> <p>19 Experience Requirements"?</p> <p>20 A. Correct.</p> <p>21 Q. Okay, and could Google choose to</p> <p>22 waive those minimum qualifications?</p> <p>23 MR. GAGE: Objection. I don't know</p> <p>24 if I heard the question right. Did you say</p> <p>25 could or did?</p>	<p style="text-align: right;">Page 28</p> <p>1 - JENNIFER BURDIS -</p> <p>2 a little confusing, so...</p> <p>3 Q. Okay. So you had mentioned that this</p> <p>4 document contains the minimum qualifications for</p> <p>5 the role in the "Skills and Experience</p> <p>6 Requirements" section --</p> <p>7 A. Okay.</p> <p>8 Q. -- so I'm asking: Where in here does</p> <p>9 it document the minimum qualifications?</p> <p>10 A. Well, now I --</p> <p>11 MR. GAGE: Objection. Go ahead.</p> <p>12 A. Now that I'm looking at the job</p> <p>13 description, I realize that the headline where the</p> <p>14 bullets that's your reading out reside are</p> <p>15 actually under the "Skills and Experience</p> <p>16 Requirements" and there's no mention of minimum</p> <p>17 qualifications in that section of the job</p> <p>18 description.</p> <p>19 Q. Okay. So are the minimum</p> <p>20 qualifications for this job description listed</p> <p>21 elsewhere?</p> <p>22 A. They would likely be in GHire.</p> <p>23 Q. So how did you determine -- I'm</p> <p>24 sorry, one moment.</p> <p>25 So if you were to look up the minimum</p>
<p style="text-align: right;">Page 27</p> <p>1 - JENNIFER BURDIS -</p> <p>2 MS. GELFAND: "Could" they.</p> <p>3 MR. GAGE: Oh, could. Could, okay.</p> <p>4 Objection.</p> <p>5 A. I'm not sure how to answer that.</p> <p>6 Q. Okay. So let's walk through these</p> <p>7 minimum qualifications. So the first one says</p> <p>8 that, "The ideal candidate will have extensive</p> <p>9 experience co-creating Cloud roadmaps with</p> <p>10 customers and/or vendors of the CIO, CTO, SVP of</p> <p>11 engineering levels."</p> <p>12 MR. GAGE: Objection.</p> <p>13 Q. Would this be a minimum qualification</p> <p>14 for the technical director role?</p> <p>15 A. No.</p> <p>16 Q. Okay. Would that be a preferred</p> <p>17 qualification?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. I don't know how to answer that</p> <p>20 question.</p> <p>21 Q. Okay, and if you could take a look at</p> <p>22 that time second bullet point, is that a minimum</p> <p>23 qualification for the technical director role?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. I'm finding this section of questions</p>	<p style="text-align: right;">Page 29</p> <p>1 - JENNIFER BURDIS -</p> <p>2 qualifications for the technical director role,</p> <p>3 where -- where in GHire would that be located?</p> <p>4 A. It would be under the requirements in</p> <p>5 GHire where there is a section to input minimum</p> <p>6 qualifications.</p> <p>7 Q. Do you recall what those minimum</p> <p>8 qualifications were with respect to the technical</p> <p>9 director role?</p> <p>10 A. I don't.</p> <p>11 Q. Okay. So how did you determine</p> <p>12 whether a candidate was a match for the technical</p> <p>13 director role?</p> <p>14 MR. GAGE: Objection.</p> <p>15 A. Maybe you could rephrase.</p> <p>16 Q. Sure. So when a candidate applied</p> <p>17 for the technical director position, what factors</p> <p>18 did you use to determine whether they would be</p> <p>19 brought in for an interview?</p> <p>20 A. So there were a number of different</p> <p>21 factors taken into account. Industry experience</p> <p>22 would be one of them. The extent of a candidate's</p> <p>23 experience and years of experience would play a</p> <p>24 part in that decision. Relevant experience with</p> <p>25 regard to the specific area of technology and also</p>

<p style="text-align: right;">Page 30</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 for the industry verticals we were hiring for,</p> <p>2 relevant experience within that domain.</p> <p>3</p> <p>4 Q. Anything else?</p> <p>5 A. Educational background is also</p> <p>6 another factor, so we consider.</p> <p>7 Q. Okay. So when you said that years of</p> <p>8 experience played a part in your determination,</p> <p>9 can you speak more about that? What were the</p> <p>10 years of experience that you considered?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. The -- the boundaries of years of</p> <p>13 experience are not concrete, so that's difficult</p> <p>14 to answer.</p> <p>15 Q. Okay, and so at the time that the</p> <p>16 candidates came in for an interview, had you made</p> <p>17 an assessment about their level?</p> <p>18 A. An initial one, yes.</p> <p>19 Q. So this was a preinterview initial</p> <p>20 assessment?</p> <p>21 A. Yes.</p> <p>22 MR. GAGE: Objection.</p> <p>23 Q. Okay. Was there any policy that laid</p> <p>24 out how years of experience translated into level?</p> <p>25 MR. GAGE: Objection.</p>	<p style="text-align: right;">Page 32</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 level for the technical director role. Did anyone</p> <p>2 else make an assessment at that time?</p> <p>3</p> <p>4 A. Yes.</p> <p>5 Q. Who?</p> <p>6 A. The sourcer, Krista Callahan. The</p> <p>7 sourcer; Krista, with a K, Callahan.</p> <p>8 Q. And what was Ms. Callahan's position?</p> <p>9 A. She was Ulku's sourcer, so she was</p> <p>10 the first person that Ulku had contact with and</p> <p>11 engaged with for the role.</p> <p>12 Q. And do you recall what she assessed</p> <p>13 Ms. Rowe's level at?</p> <p>14 A. I recall Level 8.</p> <p>15 Q. Okay, and do you recall what that</p> <p>16 assessment was based on?</p> <p>17 A. You would need to ask Krista that</p> <p>18 question.</p> <p>19 Q. And would that assessment be</p> <p>20 documented anywhere?</p> <p>21 A. Again, Krista may have documentation</p> <p>22 that I'm unaware of.</p> <p>23 Q. Okay, and did you -- did you document</p> <p>24 your assessment of Ms. Rowe's level anywhere?</p> <p>25 A. It may be on certain documents that</p>
<p style="text-align: right;">Page 31</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 A. I believe there might be some</p> <p>2 documentation around that, but I don't recall the</p> <p>3 detail.</p> <p>4</p> <p>5 Q. Okay, and could you deviate</p> <p>6 from -- from that?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. Taking into account other factors</p> <p>9 that we consider in the screening process, yes.</p> <p>10 Q. Okay, and so did you look at that</p> <p>11 documentation that you mentioned at the time that</p> <p>12 you were recruiting for the technical director</p> <p>13 role related to years of experience?</p> <p>14 A. Yes.</p> <p>15 Q. And the years of experience, were</p> <p>16 those bands of years or were they broken down year</p> <p>17 by year?</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. They were bands.</p> <p>20 Q. So do you recall with the technical</p> <p>21 director position, what bands equated to which</p> <p>22 level?</p> <p>23 A. I do not.</p> <p>24 Q. Okay. So you stated that you made an</p> <p>25 initial preinterview assessment of a candidate's</p>	<p style="text-align: right;">Page 33</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 we were considering Ulku at Level 8. I don't</p> <p>2 remember exactly which documents that information</p> <p>3 would reside on.</p> <p>4</p> <p>5 Q. Okay, and did you always document</p> <p>6 your assessment, your preinterview assessment, for</p> <p>7 a candidate's level?</p> <p>8 A. Yes.</p> <p>9 Q. And did you review any criteria in</p> <p>10 making that assessment?</p> <p>11 A. Yes.</p> <p>12 Q. And what did you review?</p> <p>13 A. The minimum qualifications and the</p> <p>14 factors that I previously listed when we consider</p> <p>15 where a candidate might fit within the</p> <p>16 organization level-wise.</p> <p>17 Q. Okay, and did you document this in</p> <p>18 GHire?</p> <p>19 A. I don't recall --</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. I don't recall if it's written in</p> <p>22 GHire.</p> <p>23 Q. Do you recall whether it's written</p> <p>24 anywhere else?</p> <p>25 MR. GAGE: Objection.</p>

Jennifer Burdis
December 09, 2020

42 to 45

<p style="text-align: right;">Page 42</p> <p>1 - JENNIFER BURDIS -</p> <p>2 decision-making and it wouldn't -- that wouldn't</p> <p>3 sway things either way.</p> <p>4 Q. Okay. So going down on the same</p> <p>5 document to the first bullet point it says</p> <p>6 "Consistent evaluation for all candidates," do you</p> <p>7 see that?</p> <p>8 A. I do.</p> <p>9 Q. So it says that, "We assess</p> <p>10 candidates against structured rubrics during the</p> <p>11 interview process to ensure consistency and reduce</p> <p>12 bias when evaluating candidates." So was that</p> <p>13 true at the time that you were recruiting for the</p> <p>14 technical director's role?</p> <p>15 A. Just give me a second.</p> <p>16 Yes.</p> <p>17 Q. Okay, and which rubrics did you use?</p> <p>18 A. I don't recall specific documents or</p> <p>19 names of documents, but there will be a rubrics</p> <p>20 that speaks to the Level 8 process and Level 9</p> <p>21 process.</p> <p>22 Q. Okay. So if you had assessed an</p> <p>23 individual at a Level 8 prior to their interview,</p> <p>24 that individual would be assessed according to the</p> <p>25 Level 8 rubric?</p>	<p style="text-align: right;">Page 44</p> <p>1 - JENNIFER BURDIS -</p> <p>2 technical director position?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. As far as you were aware, did</p> <p>5 Google -- sorry.</p> <p>6 Did Google have a policy that the</p> <p>7 number of years of work experience dictated the</p> <p>8 level that someone would come in at?</p> <p>9 A. I'm not aware of that policy.</p> <p>10 Q. So what was your understanding of how</p> <p>11 the years of experience of a candidate were</p> <p>12 considered under Google's leveling policy?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. They were only guidelines. They were</p> <p>15 guidelines.</p> <p>16 Q. So Google didn't have a policy that</p> <p>17 someone with a certain number of years of</p> <p>18 experience would automatically come in at a</p> <p>19 certain level?</p> <p>20 A. No.</p> <p>21 Q. So for any role at Google, someone</p> <p>22 with say 17 years of experience could come in as a</p> <p>23 Level 9 if they were being hired for a Level 9</p> <p>24 role?</p> <p>25 A. If they met --</p>
<p style="text-align: right;">Page 43</p> <p>1 - JENNIFER BURDIS -</p> <p>2 A. With consideration --</p> <p>3 MR. GAGE: Objection.</p> <p>4 Go ahead.</p> <p>5 A. With consideration of levels, given</p> <p>6 that this specific job role was spanning two</p> <p>7 levels, the process would include the first levels</p> <p>8 throughout -- it would be inclusive of both Level</p> <p>9 8s and Level 9s throughout.</p> <p>10 Q. So if you had made an initial</p> <p>11 assessment that a candidate was a Level 8, could</p> <p>12 or would -- would the interviewer still look at</p> <p>13 the Level 9 rubric?</p> <p>14 A. Yes.</p> <p>15 Q. Okay, and were these same rubrics</p> <p>16 used for all candidates in the technical director</p> <p>17 position?</p> <p>18 A. Yes.</p> <p>19 Q. Okay, and so continuing where we left</p> <p>20 off in the document, it says "While we do take</p> <p>21 prior experience into consideration, we don't rely</p> <p>22 on company names and job titles to understand a</p> <p>23 candidate's capabilities."</p> <p>24 Did you understand that to be true at</p> <p>25 the time that you were recruiting for the</p>	<p style="text-align: right;">Page 45</p> <p>1 - JENNIFER BURDIS -</p> <p>2 MR. GAGE: Objection.</p> <p>3 Q. Sorry?</p> <p>4 A. If they met the criteria for the</p> <p>5 role, then that is possible.</p> <p>6 Q. Okay, and could someone with 25 years</p> <p>7 of experience come in at a Level 7 if they were</p> <p>8 being hired for a Level 7 role?</p> <p>9 A. Yes.</p> <p>10 MR. GAGE: Objection.</p> <p>11 Q. Okay, and so did Google prescribe any</p> <p>12 meaningful difference between someone with 15</p> <p>13 years of experience versus someone with 17 years</p> <p>14 of experience in terms of leveling?</p> <p>15 MR. GAGE: Objection.</p> <p>16 A. No.</p> <p>17 Q. Okay. Did Google prescribe any</p> <p>18 meaningful difference between someone with 19</p> <p>19 years of experience versus someone with 20 years</p> <p>20 of experience?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. No.</p> <p>23 Q. Okay. How about between 19 years of</p> <p>24 experience and 21 years of experience?</p> <p>25 MR. GAGE: Objection.</p>

<p style="text-align: right;">Page 46</p> <p>1 - JENNIFER BURDIS -</p> <p>2 A. No.</p> <p>3 Q. And how about between 23 years of</p> <p>4 experience versus 25 years of experience?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. No.</p> <p>7 Q. Did Google provide you with any</p> <p>8 guidance on how number of years of experience</p> <p>9 would be evaluated for purposes of leveling?</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. Sorry, could you repeat that question</p> <p>12 again?</p> <p>13 Q. Sure. Did Google provide you with</p> <p>14 any guidance about how number of years of work</p> <p>15 experience would be evaluated for purposes of</p> <p>16 leveling?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. I believe the documentation is purely</p> <p>19 a guide and it's -- it's a guideline; it not</p> <p>20 concrete.</p> <p>21 Q. And did Google provide you with any</p> <p>22 guidance on how to consider years of experience</p> <p>23 when individuals were being hired for the same</p> <p>24 role?</p> <p>25 MR. GAGE: Objection.</p>	<p style="text-align: right;">Page 48</p> <p>1 - JENNIFER BURDIS -</p> <p>2 A. So in place of a hiring committee the</p> <p>3 packet, the candidate packet, would be submitted</p> <p>4 to the team you see here, CESO, for SVP review.</p> <p>5 Concurrently to that, the packet would also be put</p> <p>6 in front of Diane Greene to review.</p> <p>7 Q. Did Ms. Greene review all the packets</p> <p>8 for the technical director candidates?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. I do not know if she reviewed them.</p> <p>11 She had access to them.</p> <p>12 Q. Okay, and so this paragraph states</p> <p>13 that, "A levelling rationale is typically crafted</p> <p>14 by the recruiter and the hiring manager together."</p> <p>15 Was the leveling rationale always included in the</p> <p>16 packet?</p> <p>17 A. Yes.</p> <p>18 Q. And what information did you</p> <p>19 understand to be included in the levelling</p> <p>20 rationale?</p> <p>21 A. Typically the leveling rationale</p> <p>22 would come from the hiring manager. So in this</p> <p>23 instance, it would be Will Grannis and he would</p> <p>24 essentially write between one sentence and four to</p> <p>25 five sentences on his opinion of where a candidate</p>
<p style="text-align: right;">Page 47</p> <p>1 - JENNIFER BURDIS -</p> <p>2 A. Again, years of experience is one</p> <p>3 factor.</p> <p>4 Q. Okay. So going back to this</p> <p>5 document, let me know when you have that opened.</p> <p>6 A. I do.</p> <p>7 Q. Okay.</p> <p>8 MR. GAGE: Are we still on Tab 164?</p> <p>9 MS. GELFAND: Yes.</p> <p>10 MR. GAGE: Okay.</p> <p>11 Q. The second bullet point says</p> <p>12 "Independent Review" and you can read through that</p> <p>13 if you need to refresh your recollection about</p> <p>14 this policy, but my question for you is: Was this</p> <p>15 process in place at the time that you were</p> <p>16 recruiting for the technical director role?</p> <p>17 A. I will just read it, if that's okay.</p> <p>18 Q. Sure.</p> <p>19 A. Okay. So for Level 8 candidates,</p> <p>20 Level 8-plus candidates, at the time I was hiring</p> <p>21 for the office of the CTO we did not have a hiring</p> <p>22 committee stage for these candidates.</p> <p>23 Q. Okay. So -- so then can you walk me</p> <p>24 through the process of hiring for the technical</p> <p>25 director role without the hiring committee?</p>	<p style="text-align: right;">Page 49</p> <p>1 - JENNIFER BURDIS -</p> <p>2 would sit level-wise.</p> <p>3 Q. Okay, and so you stated that Mr.</p> <p>4 Grannis would make a preinterview assessment of a</p> <p>5 candidate's level, correct?</p> <p>6 A. Correct.</p> <p>7 Q. And so was this rationale in addition</p> <p>8 to that initial assessment?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. You can put that document</p> <p>11 aside.</p> <p>12 So did you have any role in the</p> <p>13 interviewing portion of the hiring process for the</p> <p>14 technical directors?</p> <p>15 A. Not outside of helping to coordinate</p> <p>16 the logistics.</p> <p>17 Q. Did you put together a panel of</p> <p>18 interviewers?</p> <p>19 A. Yes.</p> <p>20 Q. Did anyone else, in addition to you,</p> <p>21 select the interviewers?</p> <p>22 A. Yes.</p> <p>23 MR. GAGE: Objection.</p> <p>24 Q. And who was that?</p> <p>25 A. Will Grannis.</p>

Jennifer Burdis
December 09, 2020

50 to 53

<p style="text-align: right;">Page 50</p> <p>1 - JENNIFER BURDIS -</p> <p>2 Q. And what was the choice of</p> <p>3 interviewers based on?</p> <p>4 MR. GAGE: Objection.</p> <p>5 A. I don't fully understand the</p> <p>6 questions to answer.</p> <p>7 Q. So how did you and Mr. Grannis decide</p> <p>8 who would be on the panel of interviewers for the</p> <p>9 technical director's role?</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. You would need to ask --</p> <p>12 MR. GAGE: She said -- yeah, I don't</p> <p>13 think she said she did it.</p> <p>14 A. -- Will.</p> <p>15 Q. And do you know if the same panel of</p> <p>16 interviewers were used for all candidates for that</p> <p>17 role?</p> <p>18 A. The panels were not identical. There</p> <p>19 was a lot of crossover, but due to the logistics</p> <p>20 side and scheduling constraints we had a pool of</p> <p>21 interviewers that we selected from.</p> <p>22 Q. Okay, and do you know what the choice</p> <p>23 of interviewers was based on?</p> <p>24 MR. GAGE: Objection.</p> <p>25 A. You would need to ask Will.</p>	<p style="text-align: right;">Page 52</p> <p>1 - JENNIFER BURDIS -</p> <p>2 Q. Is that no? Sorry, you cut out.</p> <p>3 A. No, I do not recognize it.</p> <p>4 Q. Have you ever seen anything like</p> <p>5 this?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. No.</p> <p>8 Q. Okay. So you're not aware if any</p> <p>9 L 8-plus assessment-based interview questions were</p> <p>10 used for the technical director role?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. I am not aware.</p> <p>13 Q. Are you aware -- did the questions</p> <p>14 differ at all based on whether someone was being</p> <p>15 considered as a Level 8 or a Level 9?</p> <p>16 A. Not to my knowledge.</p> <p>17 Q. Okay. So speaking specifically about</p> <p>18 the technical director's position, was the</p> <p>19 decision to make an offer to a candidate made</p> <p>20 after all of the interviewers' interviews were</p> <p>21 complete?</p> <p>22 A. Correct.</p> <p>23 Q. And who made the decision to extend</p> <p>24 an offer?</p> <p>25 A. We receive -- the recruiter receives</p>
<p style="text-align: right;">Page 51</p> <p>1 - JENNIFER BURDIS -</p> <p>2 Q. Was Mr. Grannis on the panel for</p> <p>3 these candidates?</p> <p>4 A. He met with every candidate.</p> <p>5 Q. Do you know if Mr. -- if Brian</p> <p>6 Stevens met with every candidate?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. No.</p> <p>9 Q. Who came up with the questions that</p> <p>10 would be asked on these interviews?</p> <p>11 A. Will Grannis.</p> <p>12 Q. And were assessment-based interview</p> <p>13 questions used for all of the candidates?</p> <p>14 A. I don't fully understand the</p> <p>15 question, "assessment-based interview questions."</p> <p>16 Q. Sure. You know, maybe I will -- I'm</p> <p>17 going to be adding a document to the Box, so you</p> <p>18 can look at that. We just need one second.</p> <p>19 Okay, you should see it now in the</p> <p>20 Box. It's going to be Tab 189 and we're going to</p> <p>21 mark -- this has been previously marked as Exhibit</p> <p>22 79. Let me know if you have that open.</p> <p>23 A. I do.</p> <p>24 Q. Do you recognize this document?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 53</p> <p>1 - JENNIFER BURDIS -</p> <p>2 notification of SVP approval and at that point</p> <p>3 you -- the recruiter can extend an offer.</p> <p>4 Q. So aside what was in GHire for the</p> <p>5 technical director position, did any interviewers</p> <p>6 tell you what their decision to hire someone was</p> <p>7 based on?</p> <p>8 A. Everything will be in GHire.</p> <p>9 Q. And did Will Grannis make a</p> <p>10 recommendation to the hiring committee?</p> <p>11 MR. GAGE: Objection.</p> <p>12 A. There was no hiring committee.</p> <p>13 Q. And so you would assess Mr. Grannis'</p> <p>14 recommendation as well as the interviewers to</p> <p>15 determine whether to extend an offer?</p> <p>16 MR. GAGE: Objection.</p> <p>17 A. My extending the offer was purely</p> <p>18 based on SVP approval.</p> <p>19 Q. And the SVP would review the package</p> <p>20 that you prepared?</p> <p>21 A. Correct.</p> <p>22 MR. GAGE: Objection.</p> <p>23 Q. So who made the decision about what</p> <p>24 level a candidate for technical director would be</p> <p>25 hired at?</p>

Jennifer Burdis
December 09, 2020

54 to 57

<p style="text-align: right;">Page 54</p> <p>1 - JENNIFER BURDIS -</p> <p>2 A. Many people through the process.</p> <p>3 Q. And who are those?</p> <p>4 A. The final decision would be the SVP</p> <p>5 to review and approve, but the checkpoints of</p> <p>6 deciding where a candidate would reside level-wise</p> <p>7 through the process would include the recruitment</p> <p>8 team, the interview panel, the hiring manager, and</p> <p>9 the two SVP reviewers.</p> <p>10 Q. And who was the SVP in this -- in</p> <p>11 this, for the technical director position?</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. Diane Greene had access to Ulku's</p> <p>14 packet or Holtz and Sridhar. The two additional</p> <p>15 SVPs were Urs, U-R-S, Holtz and Sridhar. I can't</p> <p>16 recall his last name enough to be accurate.</p> <p>17 Sridhar, S-R-I-D-H-A-R. Sridhar.</p> <p>18 Q. So who made the final decision with</p> <p>19 respect to Ms. Rowe's level?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. The SVP I just listed.</p> <p>22 Q. And was that doc -- was that decision</p> <p>23 documented anywhere?</p> <p>24 A. Yes, in GHire.</p> <p>25 Q. And did Mr. Grannis make a final</p>	<p style="text-align: right;">Page 56</p> <p>1 - JENNIFER BURDIS -</p> <p>2 Will where we discussed all candidates in process</p> <p>3 and that conversation may have taken place</p> <p>4 verbally.</p> <p>5 Q. Okay. I would like us to go back to</p> <p>6 the Box. I'm adding another document. Give me</p> <p>7 one second.</p> <p>8 Okay. You should see in the</p> <p>9 Box, Tab 160 and this -- this document has been</p> <p>10 previously marked as Exhibit 62. Let me know when</p> <p>11 you have that open.</p> <p>12 A. I have that open.</p> <p>13 MR. GAGE: You said 1-6-0, Shira?</p> <p>14 MS. GELFAND: Tab 1-6-0.</p> <p>15 MR. GAGE: Yup, okay.</p> <p>16 MS. GELFAND: Okay.</p> <p>17 Q. Do you recognize this document?</p> <p>18 A. There's not -- I may have seen it in</p> <p>19 the past, but I don't recall.</p> <p>20 Q. Is this part of Google's leveling</p> <p>21 policy?</p> <p>22 A. I would assume so based on the title.</p> <p>23 Q. Okay. So the document says, "What</p> <p>24 the leveling rationale by staffers includes and</p> <p>25 using the template below, you'll include the</p>
<p style="text-align: right;">Page 55</p> <p>1 - JENNIFER BURDIS -</p> <p>2 recommendation for what level --</p> <p>3 MR. GAGE: Objection.</p> <p>4 Q. -- for what level Ms. Rowe would be</p> <p>5 hired in at?</p> <p>6 A. Yes.</p> <p>7 Q. Did he tell you what he based his</p> <p>8 decision on?</p> <p>9 A. He based his decision on the</p> <p>10 assessment throughout the process of Ulku Rowe's</p> <p>11 level.</p> <p>12 Q. And did he document that anywhere?</p> <p>13 A. His recommendation is documented in</p> <p>14 the offer packet.</p> <p>15 Q. Did you play any role in deciding</p> <p>16 what level a technical director would be hired at?</p> <p>17 A. No.</p> <p>18 MR. GAGE: Objection.</p> <p>19 Q. Okay, and outside of what Mr. Grannis</p> <p>20 documented in the offer packet, did he communicate</p> <p>21 with you what his leveling recommendation was</p> <p>22 based on?</p> <p>23 MR. GAGE: Objection.</p> <p>24 A. I don't recall specific</p> <p>25 conversations, but I had a weekly meeting with</p>	<p style="text-align: right;">Page 57</p> <p>1 - JENNIFER BURDIS -</p> <p>2 following in every packet." So Number 1 says,</p> <p>3 "The reason the interview rubric level was</p> <p>4 chosen." Do you see that?</p> <p>5 A. I do.</p> <p>6 Q. Did you include this in every packet?</p> <p>7 A. I would like to know if this document</p> <p>8 was released at the same time as the concerned</p> <p>9 policy in August, 2019 because that was a long</p> <p>10 time after Ulku's process.</p> <p>11 Q. So this policy may not have been in</p> <p>12 place at that time?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. Potentially.</p> <p>15 Q. Okay. So my question is for you</p> <p>16 whether you included the preinterview rubric level</p> <p>17 in every packet at that time.</p> <p>18 MR. GAGE: Objection.</p> <p>19 A. I don't fully understand the</p> <p>20 question. Sorry.</p> <p>21 Q. So my, you know, my understanding is</p> <p>22 that this policy may not have been in place at the</p> <p>23 time that you were recruiting for the technical</p> <p>24 director role. So my question for you is whether</p> <p>25 or not this policy was in place, whether in every</p>

Jennifer Burdis
December 09, 2020

86 to 89

<p style="text-align: right;">Page 86</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 A. I don't recall the specifics, but</p> <p>2 based on the offer packet offer and the offer</p> <p>3 letter offer being different, there was likely</p> <p>4 some negotiation conversations that took place.</p> <p>5 Q. So do you know what factors Google</p> <p>6 considered in setting his base salary at \$325,000?</p> <p>7 MR. GAGE: Objection.</p> <p>8 A. That would be a question for Chris</p> <p>9 Humez.</p> <p>10 Q. Okay. Do you know whether Diane</p> <p>11 Greene approved Mr. Harteau's offer?</p> <p>12 A. I received notification from Diane's</p> <p>13 recruiter that I could proceed with an offer.</p> <p>14 Q. And did MS. GELFAND provide any sort</p> <p>15 of feedback about Mr. Harteau's candidacy?</p> <p>16 A. I do not recall.</p> <p>17 Q. And who was her -- who was Ms.</p> <p>18 Greene's recruiter that sent you that</p> <p>19 notification?</p> <p>20 A. Her name was Roopa, R-O-O-P-A. I</p> <p>21 would need to look up the spelling of her last</p> <p>22 name. I don't remember the spelling. I don't</p> <p>23 recall her last name, no.</p> <p>24 Q. Did you have any discussions with</p> <p>25</p>	<p style="text-align: right;">Page 88</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 A. I do not know.</p> <p>2 Q. And you were the recruiter for Ben</p> <p>3 Wilson?</p> <p>4 A. I was.</p> <p>5 Q. And so what was the basis for the</p> <p>6 decision to hire Mr. Wilson as a Level 9?</p> <p>7 A. The same assessment criteria will</p> <p>8 have been used for Ben's initial screening process</p> <p>9 like all candidates through the process. Ben was</p> <p>10 an industry vertical ex -- expert in the</p> <p>11 technology space and a C-level executive.</p> <p>12 Q. So your recommendation was -- sorry,</p> <p>13 one second.</p> <p>14 Did you document those -- that</p> <p>15 criteria anywhere?</p> <p>16 A. I don't remember if I documented</p> <p>17 anywhere, but if I did it would be in GHire.</p> <p>18 Q. And did you have any conversations</p> <p>19 with anyone about this criteria?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. It's possible that Will and I spoke</p> <p>22 during our weekly meeting about them.</p> <p>23 Q. Do you recall any specific</p> <p>24 conversations with Mr. Grannis about Mr. Wilson?</p> <p>25</p>
<p style="text-align: right;">Page 87</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 Diane Greene about Mr. Harteau?</p> <p>2 A. No.</p> <p>3 Q. Did MS. GELFAND provide any sort of</p> <p>4 leveling recommendation for Mr. Harteau?</p> <p>5 MR. GAGE: Objection.</p> <p>6 A. Not to my knowledge.</p> <p>7 Q. So that notification from Diane</p> <p>8 Greene's recruiter, what would have been included</p> <p>9 in that?</p> <p>10 MR. GAGE: Objection, asked and</p> <p>11 answered.</p> <p>12 A. Approval for additional SVP review.</p> <p>13 Q. Okay. Did you have any conversations</p> <p>14 with Diane Greene at any point about the technical</p> <p>15 director or the technical director's role?</p> <p>16 A. No.</p> <p>17 Q. Okay. Were you the recruiter for</p> <p>18 Evren Eryurek?</p> <p>19 A. I was not, no.</p> <p>20 Q. Were you at all involved in his</p> <p>21 hiring?</p> <p>22 A. No.</p> <p>23 Q. So you don't know the basis for the</p> <p>24 decision to hire him as a Level 9?</p> <p>25</p>	<p style="text-align: right;">Page 89</p> <p style="text-align: center;">- JENNIFER BURDIS -</p> <p>1 A. I do not.</p> <p>2 Q. Okay. So what was the business</p> <p>3 necessity served in tying then the vertical</p> <p>4 industry expertise to the determination of his</p> <p>5 level?</p> <p>6 MR. GAGE: Objection.</p> <p>7 A. If I think I understand the question</p> <p>8 correctly, there were no concrete guidelines</p> <p>9 around time spent in roles.</p> <p>10 Q. Do you know whether Mr. Grannis</p> <p>11 analyzed the business necessity for these -- for</p> <p>12 this leveling decision?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. You would need to ask Will.</p> <p>15 Q. Okay. So you don't know?</p> <p>16 A. No.</p> <p>17 Q. Okay. Do you know what factors</p> <p>18 Google considered in setting Mr. Wilson's base</p> <p>19 compensation?</p> <p>20 MR. GAGE: Objection.</p> <p>21 A. You would need to ask Chris Humez,</p> <p>22 the compensation analyst.</p> <p>23 Q. So you don't know?</p> <p>24 A. I do not know.</p> <p>25</p>